

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

Eliseo Rivera Cortés, Gloria Pillot, et al,

Plaintiffs

v.

Airport Catering Services, Corp.,
Union Independiente de Trabajadores
de Aeropuertos

Defendants

Civil No. 98-2092(GG)

CIVIL ACTION

MOTION IN COMPLIANCE WITH ORDER

TO THE HONORABLE COURT:

Comes now Co-Defendant, Airport Catering Services Corp., hereinafter referred to as ACS, represented by its undersigned attorneys and very respectfully states and prays as follows:

1. On November 8, 2004, this Honorable Court, emitted an Order in which it granted the parties, in the above referenced matter, a term of twenty (20) days to submit any additional translated portions in English, or seek an extension, of any relevant portion or attachment of documents submitted in the motions or pleadings before the consideration of this Honorable Court (hereinafter referred to as the "Order"). See, Docket Entry # 100.

2. A review of the docket, and the motions or pleadings submitted therewith, reveals that the following documents where submitted in Spanish without a corresponding certified translation in English:

a. Acuerdo de Transacción Y Relevó- entered to ACS and Eliseo Rivera Cortés on September 28, 1995.

b. Aviso de Desestimación de Cargo- emitted by the P.R. Labor Relations Board on February 6, 1998, on case No. CA-97-91

c. Certificación- emitted by the P.R. Labor Relations Board on October 28, 2002, in cases No. CA-97-91 and CA-97-90.

d. Resolución- emitted by the P.R. Labor Relations Board on October 20, 1998, in cases No. CA-97-91 and CA-97-90.

e. Orden de Consolidación- emitted by the P.R. Labor Relations Board on September 9, 1998, in cases No. CA-97-91 and CA-97-90.

f. Aviso de Presentación de Notificación de Traslado al Tribunal Federal de Distrito- filed by ACS before the P.R. Labor Relations Board on September 31, 1998, in case No. CA-97-90.

g. Solicitud de Listado de Los Querellantes Envueltos en el Presente Caso- filed by ACS before the P.R. Labor Relations Board on October 7, 1998, in case No. CA-97-90.

h. Aviso de Presentación de Notificación de Traslado al Tribunal Federal de Distrito- filed by the Union before the P.R. Labor Relations Board on October 8, 1998, in case No. CA-97-91.

i. Resolución- emitted by the P.R. Labor Relations Board on October 20, 1998, in cases No. CA-97-91 and CA-97-90.

j. Moción- filed by the Union before the P.R. Labor Relations Board on October 13, 1998, in case No. CA-97-91.

k. Solicitud Para que se Den por Admitidas las Alegaciones- filed by Plaintiffs before the P.R. Labor Relations Board on October 6, 1998, in cases No. CA-97-91 and CA-97-90.

l. Resolución- emitted by the P.R. Labor Relations Board on October 2, 1998, in cases No. CA-97-91 and CA-97-90.

m. Moción Sobre Representación Profesional Adicional- filed by Juan R. Zalduondo y Frank Zorrilla Maldonado before the P.R. Labor Relations Board on September 15, 1998, in cases No. CA-97-91 and CA-97-90.

n. Querella- emitted by the P.R. Labor Relations Board on August 14, 1998, in cases No. CA-97-90.

o. Resolución- emitted by the P.R. Labor Relations Board on June 12, 1998, in cases No. CA-97-91.

p. Cargo- filed by Eliseo Rivera Cortés before the P.R. Labor Relations Board on August 26, 1997, in case No. CA-97-90.

q. 1era Enmienda Cargo- filed by Eliseo Rivera Cortés before the P.R. Labor Relations Board on September 23, 1997, in case No. CA-97-90.

r. Carta ACS- dated May 29, 1997.

3. Although all of the above-identified documents have been sent to a certified translator to be translated, they will not be available until November 30, 2004. Consequently, as foreseen by this Honorable Court, we respectfully request a five (5) day extension of time, to expire on Friday December 3, 2004, to submit the certified translations of the above-identified documents.

4. In regards to the general releases submitted in Spanish, we understand from the first footnote of the Order emitted by this Honorable Court, that since all the releases contain the same general language, only one certified translation in English is required, as authorized by this Honorable Court in its Order dated October 3, 2000. See, Docket Entry # 53. Consequently, it is

respectfully requested from this Honorable Court to confirm this interpretation. On the contrary, if this Honorable Court requires that all of the releases be presented in a translated form, we request an extension of time of thirty (30) days, from the notification of said order, to submit the same.

WHEREFORE, we respectfully request from this Honorable Court to grant the requested five (5) day extension of time to submit the translations of the above-identified documents. Moreover, in the event this Honorable Court requires that translations of all the general releases be submitted, it is respectfully requested that an extension of time of thirty (30) days be granted, from the notification of said order, to submit the same.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of November, 2004.

I HEREBY CERTIFY that on November 29, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Luis R. Mellado-González, Esq.; José Carreras, Esq.; and Nereida Feliciano Ramos, Esq.

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